ELLEN F. ROSENBLUM
Attorney General
CARLA A. SCOTT #054725
Senior Assistant Attorney General
NINA R. ENGLANDER #106119
Assistant Attorney General
Department of Justice
100 SW Market Street
Portland, OR 97201
Telephone: (971) 673-1880

Fax: (971) 673-5000

Email: Carla.A.Scott@doj.state.or.us Nina.Englander@doj.state.or.us

Attorneys for Defendants Oregon Department of Education, Colt Gill and Katherine Brown

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON

J.N., by and through his next friend, Cheryl Cisneros, E.O., by and through his next friend, Alisha Overstreet; J.V., by and through his next friend, Sarah Kaplansky; B.M. by and through his next friend, Traci Modugno; on behalf of themselves and all others similarly situated, and

COUNCIL OF PARENT ATTORNEYS AND ADVOCATES, INC.,

Plaintiffs,

v.

OREGON DEPARTMENT OF EDUCATION,

COLT GILL, in his official capacities as Director of Oregon Department of Education and Deputy Superintendent of Public Instructions for the State of Oregon, and

KATHERINE BROWN, in her official capacities as Governor and Superintendent of Public Instruction for the State of Oregon,

Defendants.

Case No. 6:19-cv-00096-AA

JOINT MOTION FOR STIPULATED SUMMARY JUDGMENT DEADLINES

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Department of Justice 100 SW Market Street Portland, OR 97201 (971) 673-1880 / Fax: (971) 673-5000 Pursuant the Scheduling Order entered on September 7, 2022, dispositive motions on the merits "are due by 3/16/2023." (ECF No. 162). To facilitate efficient briefing of cross motions for summary judgment, the Parties respectfully request that the Court enter the following briefing schedule:

Plaintiffs' Motion for Summary Judgment is due March 16, 2023. Defendants' Combined Cross-Motion for Summary Judgment and Response to Plaintiffs' Motion for Summary Judgment is due April 13, 2023. Plaintiffs' Combined Response to Defendants' Cross-Motion for Summary Judgment and Reply in Support of Plaintiffs' Motion for Summary Judgment is due May 4, 2023. Defendants' Reply in Support of Defendants' Cross-Motion for Summary Judgment is due May 18, 2023.

DATED January <u>5</u>, 2023.

Counsel for Plaintiffs:

By: s/Hannah Benton Eidsath
Thomas Stenson (OR No. 152894)
tstenson@droregon.org
Joel Greenberg (OR No. 943233)
jgreenberg@droregon.org
Disability Rights Oregon
511 SW 10th Avenue, Suite 200
Portland, OR 97205-2748
(503) 243-2081

Hannah Benton Eidsath (CT No. 428982)*
hbenton@youthlaw.org
Nina Monfredo (NY No. 5717624)*
nmonfredo@youthlaw.org
Seth Packrone (NY No. 5395769)*
spackrone@youthlaw.org
National Center for Youth Law
818 Connecticut Avenue NW, Suite 425
Washington, DC 20006
(202) 868-4781

Selene Almazan-Altobelli (MD No. 10506)*
selene@copaa.org
Council of Parent Attorneys and Advocates
8 Market Place, Suite 300
Baltimore, MD 21285
(844) 426-7224 ext. 702

Ira A. Burnim (D.C. No. 406154)*
irab@bazelon.org
Lewis Bossing (D.C. No. 984609)*
lewisb@bazelon.org
Bazelon Center for Mental Health Law
1090 Vermont Avenue NW, Suite 220
Washington, DC 20005-4900
(202) 467-5730

Michael Folger (NY No. 5151337)*
michael.folger@probonolaw.com
1 Manhattan West New York, NY 10001
(212) 735-3000
*Admitted pro hac vice

Counsel for Defendants

s/Nina R. Englander
CARLA A. SCOTT #054725
Senior Assistant Attorney General
NINA R. ENGLANDER #106119
Assistant Attorney General
Trial Attorneys
Tel (971) 673-1880
Fax (971) 673-5000
Carla.A.Scott@doj.state.or.us
Nina.Englander@doj.state.or.us
Of Attorneys for Defendants

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Department of Justice 100 SW Market Street Portland, OR 97201 (971) 673-1880 / Fax: (971) 673-5000